

Mr. William Koenemann
Colwell/General, Inc.
P.O. Box 218
Kendallville, IN 46755

Re: **113-13748-00019**
Significant Source Modification to:
Part 70 permit No.: **T 113-6020-00019**

Dear Mr. Koenemann:

Colwell/General, Inc. was issued Part 70 operating permit T 113-6020-00019 on October 6, 1998 for a paint chip and stripe card manufacturing operation. An application to modify the source was received on January 11, 2001. Pursuant to 326 IAC 2-7-10.5 the following change is approved at the source:

The maximum throughputs of lines S-1, S-2, and S-3 are changed from individual levels of 35 gallons of coatings per hour, 432 pounds of coating per hour, and 35 gallons of coatings per hour, respectively, to a combined maximum throughput of 118 gallons of coating per hour.

In addition, Condition A.1 is amended to reflect the source as an existing minor source for the purposes of PSD, as determined in the source modification review.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(I) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment with 326 IAC 2-7-11. Operation is not approved until the administrative amendment has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Noble County
Noble County Health Department
Northern Regional Office
Air Compliance Section Inspector- Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paper coating and offset printing presses operation producing paint chips and stripe cards.

Responsible Official: David Brayton
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Phone Number: 219-347-1981
SIC Code: 2752
County Location: Noble
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1. one (1) paper coating operation, including lines S-1, S-3, and S-2, with a combined maximum throughput of 118 gallons of coating per hour, with emissions controlled by thermal oxidizer TO-1 (capacity details listed under insignificant activity (1)), and emissions exhausted at Stack/Vent ID #S1;
2. one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;
3. one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1;
4. one (1) curing oven and rollcoating paper coating application system, identified as S-4, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour, with VOC emissions controlled by a new thermal oxidizer, identified as TO-2, exhausting through one (1) stack, identified as #TO-2; and
5. one (1) thermal oxidizer, identified as TO-2, using natural gas as a supplementary fuel at a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, identified as #TO-2. The curing oven on the S-4 coating line is powered through heat recovery from this thermal oxidizer.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) one (1) paper coating operation, including lines S-1, S-3, and S-2, with a combined maximum throughput of 118 gallons of coating per hour, with emissions controlled by thermal oxidizer TO-1 (capacity details listed under insignificant activity (1)), and emissions exhausted at Stack/Vent ID #S1;
- (2) one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; and
- (3) one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.
- (b) When operating the thermal oxidizer (TO-1) to achieve the limit for rule 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 94.0% overall efficiency. This efficiency is required by the rule 326 IAC 8-1-2 (a)(2). Based upon 326 IAC 8-1-2 (c) and the overall control efficiency of 94.0%, the VOC content of the coating shall not exceed 18.1 pounds per gallon of coating solids delivered to the applicator.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as CC-1, shall be limited to 45 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-1, that maintains a minimum overall control efficiency of 94.0%. This limit will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Colwell/General, Inc.
Source Location:	231 South Progress Drive E, Kendallville, IN 46755
County:	Noble
SIC Code:	2752
Operation Permit No.:	T 113-6020-00019
Operation Permit Issuance Date:	October 6, 1998
Significant Source Modification No.:	113-13748-00019
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a significant source modification application from Colwell/General, Inc. relating to the operation of their existing paint chip and stripe card manufacturing operation.

History

On January 11, 2001, Colwell/General, Inc. submitted an application to the Office of Air Quality to change the maximum throughputs of the source descriptions of paper coating lines S1, S2, and S3 listed in existing Title V permit T113-6020-00019, issued on October 6, 1998, from 35 gallons of coating per hour, 432 pounds of coating per hour, and 35 gallons of coating per hour, respectively, to one overall 118 gallon per hour rate description for all three lines.

Lines S1, S2, and S3 currently exhaust emissions to thermal oxidizer TO-1 which has an overall control efficiency of 94%. The worst case criteria pollutant unrestricted potential to emit of lines S1, S2, and S3, VOC, as derived from permits PC (57) 1690, issued on June 24, 1988, CP 113-2640-00019, issued on November 4, 1992, and 113-8079-00019, issued on April 22, 1997, respectively, are estimated to be 781 tons/yr, 1,238 tons/yr, and 849 tons/yr, respectively, for a combined total of 2,868 tons VOC/yr.

Based on the overall control efficiency of 94% for thermal oxidizer TO-1 required in the Second Significant Source Modification (113-11120-00019), issued on November 5, 1999, the limited PTE of Lines S1, S2, and S3 is estimated to be 172 tons VOC/yr.

For the source to be granted the modification as requested, there can be no relaxations of any limits established for lines S1, S2, or S3 that were imposed to prevent the source from having to undergo Prevention of Significant Deterioration (PSD) major source review, and the source PTE after the proposed change in production rate cannot exceed the PSD major source level of 250 tons per year.

There are no individual limits associated with lines S1 and S3 that prevent the source from having to undergo PSD review. However, on April 22, 1997, the Office of Air Quality issued Construction Permit (113-8079-00019), which permitted paper coating line S2 and other emission units. During the review process the existing source was determined to be a major source for volatile organic compounds (VOC). Thus, the emissions from line S2 and the other units associated with the proposed modification were limited to 39 tons/yr. This existing source determination and limit was incorrect.

Up to the date CP 113-8079-00019 was proposed, the existing source worst case criteria pollutant emissions, VOC, were only 203 tons/yr. These emissions are obtained from the only permits existing at the time, PC (57) 1690, issued on June 24, 1988 and CP 113-2640-00019, issued on November 4, 1992.

PC (57) 1690 permitted Line S1. Pursuant to PC (57) 1690, the unrestricted PTE from line S1 is estimated to be 781 tons VOC/yr. Based on the limited overall control efficiency of 90.25%, the limited PTE (source definition) is 76 tons VOC/yr.

CP 113-2640-00019 permitted Line S3. Pursuant to CP 113-2640-00019, the unrestricted PTE from Line S3 is 849 tons VOC/yr. Based on the limited 85% overall control efficiency of the then used catalytic oxidizer, the limited PTE is estimated to be 127 tons/yr.

The combined total limited PTE up to the date CP 113-8079-00019 was proposed is the sum of line S1 and S3 limited PTE, or 203 tons VOC/yr which is less than the applicable major source level of 250 tons/yr. Thus, the source was an existing minor source.

Since the source was an existing minor source, the VOC emissions for the units of CP 113-8079-00019 should have been and shall now be limited to 249 tons/yr to prevent the source from undergoing PSD review instead of the 39 tons/yr limit that was established. Utilizing the corrected 249 tons VOC/yr limit, the source limited PTE would be the existing source limited emissions (203 tons VOC/yr) plus the new limited emissions of 249 tons/yr, or 452 tons/yr.

Based on the limit of 249 tons/yr, the overall control efficiency required of thermal oxidizer TO-1 is only 19%. Since the overall control efficiency of TO-1 is already limited to 90.25% in PC (57) 1690, compliance is achieved and no changes to CP 113-8079 are required to correct the limit error.

Further, the incorrect source determination and the associated incorrect 39 tons VOC/yr limit do not affect the Title V permit because the limit established to achieve the ton/yr limit was based on the overall control efficiency only. The Title V permit requires a minimum 90.30% overall control efficiency which meets the minimum 19% overall control efficiency required to achieve the new 249 tons VOC/yr limit. Thus, no changes to the Title V permit are required to establish the correct 249 tons VOC/yr limit for line S2 and the other units associated with the modification of CP113-8079-00019.

In addition, the PTE after the proposed change in production rate cannot exceed the major source level of 250 tons VOC/yr for the source to remain a minor modification under new source review.

Permits PC (57) 1690, issued on June 24, 1988 and CP 113-2640-00019, issued on November 4, 1992, established the source limited potential to emit (PTE) at 203 tons VOC/yr. After application of the corrected 249 tons VOC/yr, CP 113-8079-00019, issued on April 22, 1997 established the source limited PTE 452 tons per year, defining the source as a major stationary source for the purposes of prevention of significant deterioration (PSD) review.

The Title V permit, 113-6020-00019, issued on October 6, 1998, reduced the source limited PTE to 407 tons VOC/yr, and second significant source modification 113-11120-00019, issued on November 5, 1999, reduced the source limited PTE to 214 tons VOC/yr. The second significant source modification defined the source as an existing minor stationary source for the purposes of PSD review and established the major source threshold for modifications at 250 tons/yr for any criteria pollutant.

Existing Approvals

The source was issued Title V Permit (113-6020-00019) on October 6, 1998. The source has been operating under this permit and the following approvals including, but not limited to, the following:

1. Construction Permit:	113-8079-00019	Issued: 4-22-97
2. First Administrative Amendment:	113-10300-00019	Issued: 2-15-99
3. First Significant Source Modification:	113-10986-00019	Issued: 7-28-99
4. Second Significant Source Modification:	113-11120-00019	Issued: 11-5-99
5. Second Administrative Amendment:	113-11506-00019	Issued: 12-28-99
6. First Significant Permit Modification:	113-11777-00019	Issued: 5-23-00

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT (PTE) DUE TO THE MODIFICATION:

The emissions generated by the proposed modification are the increased VOC emissions created by increasing the throughput rate of Lines S1 and S3 from 35 gal/hr to 39.33 gal/hr.

The unrestricted PTE due to the modification are normally based on the future potential VOC versus the past actual emissions. However, due to the limitation error of CP 113-8079-00019, there is no valid actual emission data available. Thus, the unrestricted potential to emit due to the modification shall be based on the future potential for lines S1, S2, and S3 versus current unrestricted potential to emit for Lines S1, S2, and S3.

Unrestricted PTE After the Modification for Lines S1, S2, and S3:

The following calculations determine the unrestricted PTE after the proposed permit modification based on use of the worst case coating parameters, the proposed maximum throughput of 118 gal/hr, emissions before controls, and 8,760 hours of operation.

VOC:

Lacquer Paint:

$$118 \text{ gal/hr} * 8.2 \text{ lb coat/gal coat} * 0.71 \text{ lb VOC/lb coat} * 8760 \text{ hr/yr} * 1/2000 \text{ ton VOC/lb VOC} = 3,009.04 \text{ tons/yr}$$

Solvent:

The solvent usage is 0.6% of the 118 gal/hr coating usage, or 0.71 gal/hr.

$$0.71 \text{ gal/hr} * 6.8 \text{ lb coat/gal coat} * 1 \text{ lb VOC/lb coat} * 8760 \text{ hr/yr} * 1/2000 \text{ ton VOC/lb VOC} = 21.14 \text{ tons VOC/yr}$$

The total unrestricted potential to emit after the modification for lines S1, S2, and S3 is estimated to be 3,030.18 tons VOC/yr.

$$3009.04 \text{ tons VOC/yr} + 21.14 \text{ tons VOC/yr} = 3,030 \text{ tons VOC/yr}$$

HAPs:

Paint: $118 \text{ gal/hr} * 8.2 \text{ lb coat/gal coat} * X \% \text{ HAP} * 8760 \text{ hr/yr} * 1/2000 \text{ ton HAP/lb HAP} = \text{tons HAP/yr}$
Solvent: $0.71 \text{ gal/hr} * 6.8 \text{ lb coat/gal coat} * X \% \text{ HAP} * 8760 \text{ hr/yr} * 1/2000 \text{ ton HAP/lb HAP} = \text{tons HAP/yr}$

HAP	Fraction HAP Paint	Fraction HAP Solvent	Paint UPTE (tons/yr)	Solvent UPTE (tons/yr)	Combined UPTE (tons/yr)
Xylene	0.15	0.00	635.71	-	635.71
Toluene	0.30	0.25	1271.43	6.35	1277.78
Ethylbenzene	0.01	0.00	42.38	-	42.38
Glycol Ethers	0.01	0.00	42.38	-	42.38
MEK	0.05	0.00	211.90	-	211.90
Total			2203.80	6.35	2210.15

Current Unrestricted Potential To Emit From Lines S1, S2, and S3:

VOC:

The unrestricted potential to emit (UPTE) for each line, as obtained from their respective permits are listed below:

Unit	UPTE (tons/yr)
Line S1	781
Line S2	1238
Line S3	849
Total	2868

HAPs:

HAP	Fraction HAP Paint	Fraction HAP Solvent	Paint UPTE (tons/yr)	Solvent UPTE (tons/yr)	Combined UPTE (tons/yr)
Xylene	0.15	0.00	259.54	-	259.54
Toluene	0.30	0.25	519.08	2.23	521.31
Ethylbenzene	0.01	0.00	17.30	-	17.30
Glycol Ethers	0.01	0.00	17.30	-	17.30
MEK	0.05	0.00	86.51	-	86.51
Total			899.73	2.23	901.96

Unrestricted PTE Due to the Modification:

The unrestricted PTE due to the Modification is the difference of the future potential unrestricted PTE of Lines S1, S2, and S3 and the current unrestricted potential to emit from lines S1, S2, and S3.

VOC:

UPTE Due to the Mod. = 3030.18 tons VOC/yr - 2868 tons VOC/yr = 162.18 tons VOC/yr

HAPs:

HAP	UPTE After Mod. (tons/yr)	Current UPTE	UPTE Due to Mod. (tons/yr)
Xylene	635.71	259.54	376.17
Toluene	1277.78	521.31	756.47
Ethylbenzene	42.38	17.30	25.08
Glycol Ethers	42.38	17.30	25.08
MEK	211.90	86.51	125.39
Total			1308.19

PTE OF LINES S1, S2, AND S3 AFTER THE MODIFICATION, AFTER CONTROLS:

The emissions after controls after the modification are determined based on the unrestricted potential to emit for the worst case coating combination for lines S1, S2, and S3 after the modification and the overall control efficiency of 94%.

VOC:

3030.18 tons VOC/yr * (1 - 0.94) = 181.81 tons VOC/yr

HAPs:

HAP	Total HAP UPTE (tons/yr)	% Control	HAPs After Controls (tons/yr)
Xylene	635.71	94	38.14
Toluene	1277.78	94	76.67
Ethylbenzene	42.38	94	2.54
Glycol Ethers	42.38	94	2.54
MEK	211.90	94	12.71
Total			132.60

ALLOWABLE VOC EMISSION RATE FOR LINES S1, S2, AND S3:

The allowable VOC emission rate after the modification is the current limited VOC PTE emissions from lines S1, S2, and S3 plus the 39 tons VOC/yr.

$$\text{Limited PTE tons VOC/yr} = \text{UPTE of Line (tons VOC/yr)} * (1 - 0.94)$$

Unit	UPTE (tons/yr)	Fraction Control	Limited PTE (tons/yr)
Line S1	781	0.94	46.86
Line S2	1238	0.94	74.28
Line S3	849	0.94	50.94
Total			172.08

$$172.08 \text{ tons VOC/yr} + 39 \text{ tons VOC/yr} = 211.08 \text{ tons VOC/yr}$$

Since the limited PTE after controls for lines S1, S2, and S3 (181.08 tons VOC/yr) are less than the allowable rate of 211.08 tons VOC/yr, the modification, for the purposes of new source review, is determined to be a minor modification.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the revision based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO ₂	-
VOC	3030.18
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential To Emit (tons/year)
Xylene	376.17
Toluene	756.47
Ethylbenzene	25.08
Glycol Ethers	25.08
MEK	125.39
Total	1308.19

Justification for Revision

The Title V is being revised through a Significant Source Modification. This revision is being performed pursuant to 326 IAC 2-7-10.5(f)(4) which states a significant source modification is a modification that is not an administrative amendment under section 10 of this rule or subject to subsection (d) (Minor Source Modification) and includes any modification with a potential to emit (PTE) greater than or equal to twenty-five (25) tons per year of PM, PM₁₀, SO₂, NO_x, VOC, H₂S, TRS, reduced sulfur compounds, or fluorides and any modification with a potential to emit (PTE) greater than or equal to 10 tons per year of any single HAP or greater than or equal to 25 tons per year of any combined HAPs.

The PTE of VOC exceed 25 tons per year, the single HAP PTE of xylene, toluene, ethylbenzene, glycol ethers, and MEK each exceed 10 ton per year, and the combined HAP PTE exceeds 25 tons/yr. Thus, a significant source modification is required.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Noble County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	neg.

PM ₁₀	neg.
SO ₂	neg.
VOC	214.26
CO	neg.
NO _x	neg.

Pollutant	Emissions (tons/year)
Xylene	26.07
Toluene	52.38
Ethylbenzene	1.74
Glycol Ethers	1.74
MEK	8.69
Total	90.62

- (a) This existing source is not a major PSD stationary source because no criteria pollutant emissions are emitted at a rate greater than or equal to 250 tons per year.
- (b) This existing source is a Title V major stationary source because the volatile organic compounds (VOC) are emitted at a rate greater than 100 tons per year, xylene and toluene (single HAPs) each are emitted at a rate greater than 10 tons per year, and the regulated combined HAPs are emitted at a rate greater than 25 tons per year.

Potential to Emit of Source After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Title V Modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Existing Source PTE	neg.	neg.	neg.	214.26	neg.	neg.	90.62
Source After Proposed Revision	neg.	neg.	neg.	223.99	neg.	neg.	78.49

Part 70 Major Source Threshold	-	100	100	100	100	100	10 ind. 25 tot.
PSD Major Source Level	250	250	250	250	250	250	-

- (a) This modification to an existing major stationary source is not major because the emissions due to the modification are less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

- (b) Since the potential to emit from the entire source of all criteria pollutant emissions are less than 250 tons per year, the source is a minor source pursuant to 326 IAC 2-2, PSD.
- (c) This revision to the existing Title V will not change the status of the stationary source because the emissions from the entire source will still greater than Part 70 major source thresholds.

Federal Rule Applicability

New Source Performance Standards (NSPS):

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60) that apply due to the proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) that are applicable due to the proposed modification.

State Rule Applicability

Entire Source:

There are no entire source state rules that become applicable due to this proposed modification because the preventive maintenance plan (326 IAC 1-6-3), opacity limitations (326 IAC 5-1), fugitive dust limitations (326 IAC 6-4), and emission reporting requirements (326 IAC 2-6) already apply and the proposed revision does not affect the requirements of these rules.

Individual Facilities:

There are no individual facility state rules that become applicable due to this proposed revision. 326 IAC 6-3 and 326 IAC 8-2-5 already apply and the proposed revision does not affect the requirements of these rules.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no changes in compliance monitoring required due to the proposed modification. Further, no stack testing shall be required because the proposed modification does not affect the load to thermal oxidizer (TO-1), and there will be no changes to the thermal oxidizer operating parameters.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Condition A.1 shall be amended to reflect the source as an existing minor source for the purposes of PSD

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paper coating and offset printing presses operation producing paint chips and stripe cards.

Responsible Official: David Brayton
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Phone Number: 219-347-1981
SIC Code: 2752
County Location: Noble
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
~~Major~~ **Minor** Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

Condition A.2 shall be amended to include lines S1, S2, and S3 as one operation with a maximum combined throughput of 118 gal/hr.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1. one (1) paper coating **operation, including lines**; S-1, ~~with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by direct flame incinerator, TO-1, (capacity details listed under insignificant activity (1)), then exhausted at Stack/Vent ID #S1;~~
2. ~~one (1) paper coating line, S-3, and with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;~~
3. ~~one (1) paper coating line, S-2, with a combined maximum throughput of 432 pounds~~ **118 gallons** of coating per hour; ~~with Emissions shall be controlled by a thermal oxidizer, TO-1 (capacity details listed under insignificant activity (1)), and emissions then exhausted at Stack/Vent ID #S1;~~
- 4.2. one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;

- 5-3. one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1;
- 6-4. one (1) curing oven and rollcoating paper coating application system, identified as S-4, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour, with VOC emissions controlled by a new thermal oxidizer, identified as TO-2, exhausting through one (1) stack, identified as #TO-2; and
- 7-5. one (1) thermal oxidizer, identified as TO-2, using natural gas as a supplementary fuel at a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, identified as #TO-2. The curing oven on the S-4 coating line is powered through heat recovery from this thermal oxidizer.

The facility description of Section D.1 shall be amended to include lines S1, S2, and S3 as one operation with a maximum combined throughput of 118 gal/hr.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) one (1) paper coating **operation, including** lines, S-1, ~~with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by direct flame incinerator, TO-1, (capacity details listed under insignificant activity (1)), then exhausted at Stack/Vent ID #S1;~~
- (2) ~~one (1) paper coating line, S-3, and with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;~~
- (3) ~~one (1) paper coating line, S-2, with a combined maximum throughput of 432 pounds~~ **118 gallons** of coating per hour; **with Emissions** ~~shall be~~ controlled by a thermal oxidizer; TO-1 (capacity details listed under insignificant activity (1)), **and emissions** ~~then exhausted at Stack/Vent ID #S1;~~
- (2)(4) one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; and
- (3)(5) one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Source Modification 113-13748-00019.